

124-CV-11780 PMH/MS  
United States District Court: Dated: Dec 11<sup>th</sup>, 2024

Southern District of NEW YORK:

MR. JEREMIAH Folsom HERBERT, PRO-SE, Plaintiff

- AGAINST -

Notice of Motion

J. George, etc. Al, Defendants

Motion Under Rule 45 Request Subpoena

PURSUANT TO RULE 45 OF Federal Rules of

Civil Procedure, The

This Court Issues

FOR Expert Testimony

Doctor Williams Shall

Before The Court A

#1) Plaintiff Request

Testify AS A Med

Doctor Williams, Con

Plaintiff's motions for the issuance of a subpoena (Doc. 36) and for a writ of habeas corpus ad testificandum directing DOCCS to produce incarcerated witnesses (Doc. 37) are denied as premature. Defendants' motion to dismiss the complaint is currently pending. (See Doc. 31).

The Clerk of Court is respectfully directed to terminate the letter sequence pending at Docs. 36-37 and mail a copy of this Order to Plaintiff.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
December 23, 2024

About JAN 29th, 2024 Physical INJURIES Inflicted  
Upon Plaintiff At Sing-Sing Correctional Facility.

#2) Plaintiff, Request For Subpoena Shall Be Granted  
For Doctor Williams Performed ON JAN 29, JAN. 30th 2024  
Medical EXTRAYS AND Medical M.R.I. Supported

By Medical Records To Show How Plaintiff Did  
In Fact SUFFER physical Haim And INJURIES  
Because of Defendants J. George, Johnson,  
Sergeant Ridley, Officer Camron, Officer M. Salas.

#3) Doctor Williams Shall Be Called As A  
Expert In Medical And Will Testify About  
Inflicted INJURIES:

A.) Vision To Eyes

B.) Bleeding From Head

C.) Cut To Right Cheek On Plaintiff's Face!

24-CV-1780 P.M.H/VR Page #2

It is requested under Federal Rule 45 for an issuance of Subpoena directing Doctor Williams of Webster Medical Center as a medical doctor expert, expert testimony by Doctor Williams about how on Jan. 29th, 2024 Doctor Williams performed medical extrays and medical M.R.I. because of failure to protect assault and excessive force; Doctor Williams can give a detailed account about the physical injuries imposed to Plaintiff such as:

- A) Bleeding from Head
- B) Neck and upper back INJURIES
- C) Cut with RAZOR to Right Side of Cheek
- D) Impaired Vision to Right Eye

Doctor Williams shall be produced as a witness and as a medical expert about how Plaintiff did in fact suffer imminent harm under color of law about event to occurred at Sing-Sing Correctional Facility Inside A-Block yard on Jan. 29th, 2024.

A Subpoena for expert testimony under Rule 45 shall be granted and Doctor Williams testimony shall be admissible and shall be allowed to be called to personally testify before Court at trial as an expert and as a witness by way of a subpoena under Rule 45. Respectfully submitted;

Carrie

Zeah H.